

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a)	
BRAZOS LICENSING AND)	
DEVELEOPMENT,)	
)	Case Nos. 6:20-cv-00487, 00488,
Plaintiff,)	00489, 00490, 00491, 00492,
v.)	00493, 00494, 00495, 00496,
)	and 00497-ADA
)	
ZTE CORPORATION, ZTE (USA), INC.,)	
AND ZTE (TX), INC.,)	
)	
Defendants)	

DECLARATION OF YUMING KUANG

The undersigned Declarant, YUMING KUANG, of lawful age, hereby declares, deposes and states as follows, under penalty of perjury:

1. I am IPR Counsel for Defendant ZTE Corporation (“ZTE Corp.”) and therefore have personal knowledge of the matters asserted in this Declaration.
2. ZTE Corp. has its principal place of business at ZTE Plaza, Keji Road South, Hi-Tech Industrial Park, Nanshan District, Shenzhen, Guangdong 518057, P.R. China.
3. ZTE Corp. is a separate company and maintains all corporate formalities independently of all other companies (including its direct and indirect subsidiaries), maintaining separate books and records, separate bank accounts, and separate assets.
4. ZTE Corp. is a company organized under the laws of China. The books and records of ZTE Corp. are maintained outside the United States.
5. ZTE Corp. does not do business in the United States and does not pay any sales, property, or other taxes in the United States.
6. ZTE Corp. does not make, use, sell, offer for sale, or import into the United States, any products or services (whether for end use, distribution, third-party demonstrations,

qualification testing, or any other commercial purpose; and whether accused in any of these cases or not).

7. ZTE Corp. does not have any place of business (including without limitation any physical place of business, any regular and established place of business, or any place of business of ZTE Corp.) within the United States.

8. ZTE Corp. does not own, lease, operate, manage, maintain, or otherwise exercise possession or control over any offices, warehouses, stores, servers, storage facilities, distribution facilities, manufacturing facilities, or other facilities, or other real property in the United States.

9. ZTE Corp. does not now, and has never before, owned, leased, operated, managed, maintained, or otherwise exercised any possession or control over any facility in Austin, Texas. The “research-and-development center in Austin, Texas” mentioned in the 2010 article in the complaints in the above-referenced cases was not a place of business of ZTE Corp.

10. ZTE Corp. does not advertise or represent that it has any place of business, address, or telephone listing in the United States.

11. ZTE Corp. is not registered to do business within the United States.

12. ZTE Corp. established ZTE (USA) Inc. as a subsidiary in 1998 for the purpose of marketing, distributing, selling, installing, servicing and supporting telecommunications equipment in the U.S.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS
TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

EXECUTED this 9th day of October, 2020.



YUMING KUANG, DECLARANT